

EXHIBIT B

Kate Swift

From: Fumerton, Tara A. <tfumerton@JonesDay.com>
Sent: Thursday, August 2, 2018 4:10 PM
To: Zach Bower; Michael A. Innes
Cc: External User - Tina Tabacchi; 'Migliori, Don'; 'mdl2804discovery@motleyrice.com'; Fiorentinos, Irene S.
Subject: In re National Prescription Opiate Litigation, MDL No. 2804 -- Plaintiffs' First Combined Discovery Requests

Michael and Zach,

Walmart objects to Plaintiffs' First Combined Discovery Requests (the "Combined Requests"), including without limitation on the grounds that they exceed the discovery limitations provided in CMO-1. Based on the July 30, 2018 directives from Special Master Cohen, we will treat the Combined Requests as prioritizations of plaintiffs' previous discovery requests. As such, we will not serve new objections and responses to the Combined Requests and refer plaintiffs to our responses and objections to plaintiffs' previous discovery requests. Please note, however, that in light of the hearing this morning before Judge Polster we do plan to serve amended responses and objections to plaintiffs' previous discovery requests.

Very truly yours,

Tara

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